

Patent Application S/N: 09/888,222

Attorney Docket No.: P-2177

**REMARKS**

Claims 1-28 are pending and stand rejected. Claims 29-40 are added by this Amendment. Claims 1-40 are therefore at issue. No new matter is added by this Amendment.

**The Claims Are Allowable Over the Cited Art****1. Section 102 Rejections**

The Examiner rejected Claims 1-24 and 27 as anticipated by Nakayama et al. (U.S. Patent No. 4,531,119). Applicants respectfully traverse this rejection and request reconsideration and withdrawal of this rejection in view of this Amendment.

Applicants' amended Claim 1 recites: "receiving one or more signals generated by the user which specify one or more phonetic symbol categories each of which includes one or more syllables and at least one of which includes two or more syllables."

In response to Applicants' arguments filed March 21, 2005, the Examiner argued that a key of Nakayama et al. corresponds to one syllable which is one collection of one syllable and therefore reads on the previously recited "one or more collections" of "one or more syllables." As amended, Claim 1 recites that "at least one of [the phonetic symbol categories] includes two or more syllables." Accordingly, Claim 1 as amended is allowable over Nakayama et al. for at least the reasons given in the paper filed March 21, 2005 and that discussion is incorporated herein by reference.

All pending claims directly or indirectly recite similar limitations to those discussed above with respect to Claim 1 and are therefore similarly allowable over Nakayama et al.

Claims 2, 10, and 18 recite that "the one or more phonetic symbol categories are each

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associated with a respective distinct consonant.” Nakayama et al. teach a different key for each individual kana, of which there are shown to be 46. Since there are only about 10 consonants in the Japanese language, Nakayama et al. do not teach that user-generated signals can specify a phonetic symbol category associated with a respective distinct consonant. To illustrate this further, Nakayama et al. specifically teach that at least 5 keys are associated with the same consonant: “M” is associated with the syllable “mo”, “N” is associated with the syllable “mi”, “J” is associated with the syllable “ma”, “j” is associated with the syllable “mu”, and “/” is associated with the syllable “me” -- all 5 are associated with the consonant, “m”.

Accordingly, Claims 2, 10, and 18 are allowable over Nakayama et al. for reasons independent of those given above with respect to Claim 1. Claims 3-4, 11-12, and 19-20 depend from Claims 2, 10, and 18, respectively, and are therefore similarly allowable.

Claims 31, 35, and 39 recite that “the one or more words are organized into phrases.” Nakayama neither teach nor suggest predictive interpretation of phrases. Accordingly, Claims 31, 35, and 39 are allowable over Nakayama et al. for reasons independent of those given above with respect to Claim 1.

## 2. Section 103 Rejections

The Examiner rejected Claims 25-26 and 28 as being unpatentable over Nakayama et al. in view of Ho et al (U.S. Patent No. 6,307,541). Applicants respectfully traverse this rejection and request reconsideration and withdrawal of this rejection in view of this Amendment.

Of the various recited limitations discussed above as not taught or suggested by Nakayama et al., the Examiner has cited none of those in Ho et al. Accordingly, any

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combination of Ho et al. with Nakayama et al. would be missing those same limitations, assuming arguendo that such combination was properly motivated in the prior art. Accordingly, Claims 25-26 and 28 are allowable over Nakayama et al. and Ho et al.

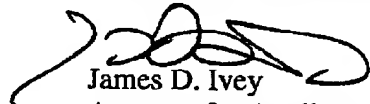
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**CONCLUSION**

Claims 1-40 are now in a condition for allowance and such action is respectfully requested. If the Examiner's next action is other than for allowance of Claims 1-40, or if the Examiner has any questions or comments with respect to the above-identified case, the Examiner is respectfully invited to telephone the undersigned at (510) 336-1100.

Respectfully submitted,



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